

1 Anthony L. Martin  
2 Nevada Bar No. 8177  
3 [anthony.martin@ogletree.com](mailto:anthony.martin@ogletree.com)  
4 Elody C. Tignor  
5 Nevada Bar No. 15663  
6 [elody.tignor@ogletree.com](mailto:elody.tignor@ogletree.com)  
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
8 10801 W. Charleston Blvd.  
9 Suite 500  
10 Las Vegas, NV 89135  
11 Telephone: 702.369.6800  
12 Fax: 702.369.6888

13  
14 *Attorneys for Defendant Starbucks Corporation dba  
15 Starbucks Coffee Company*

16 UNITED STATES DISTRICT COURT

17 FOR THE DISTRICT OF NEVADA

18 MARGARET SWANSON,

19 Plaintiff,

20 vs.

21 STARBUCKS CORPORATION dba  
22 STARBUCKS COFFEE COMPANY, a  
23 Washington Corporation,

24 Defendant.

25 Case No.: 2:23-cv-01823-APG-MDC

26 **STIPULATION AND ORDER  
TO EXTEND TIME TO SUBMIT ENE  
STATEMENT TO CLERK'S OFFICE**

27 **(FIRST REQUEST)**

28 **HEARING DATE: May 6, 2024**

Defendant Starbucks Corporation dba Starbucks Coffee Company (“Defendant”), and Plaintiff Margaret Swanson (“Plaintiff”) (collectively referred to as “Parties”), by and through their respective undersigned counsel, stipulate to, and agree upon, an extension of the deadline to submit the ENE Statement to the Clerk’s Office, for the May 6, 2024 ENE Session, currently due Monday, April 29, 2024 by 3:00 PM to **Wednesday, May 1, 2024, by 3:00 PM**. This is the Parties’ first request to extend the deadline to submit the ENE Statement and is not made for purposes of undue delay as discussed in further detail below.

29  
30     ///

1       1. On March 13, 2024, this Court entered its Order setting an ENE Session for May 6,  
 2 2024. (ECF No. 9.) The Parties were due to submit ENE Statements one (1) week prior the ENE  
 3 Session, i.e., April 29, 2024. (ECF No. 9.)

4       2. On April 8, 2024, Defendant's Counsel's office, including undersigned counsel, were  
 5 impacted by the tragedy at the Prince Law Group (offices on the same floor). Defendant's Counsel's  
 6 office was subsequently closed and they engaged in intermittent business for approximately 7-10  
 7 business days thereafter (including the closure of their office the week of the incident). This  
 8 unfortunate event impacted Counsel's ability to timely complete Defendant's ENE Statement.

9       3. The Parties therefore request that the deadline to submit the ENE Statement be  
 10 extended to **Wednesday, May 1, 2024 by 3:00 PM.**

11       This stipulation is not brought for purposes of delay or any other improper purpose.

12 Dated this 25<sup>th</sup> day of April, 2024.

13 LAW OFFICES OF MICHAEL P. BALABAN

15 /s/ Michael P. Balaban

16 Michael P. Balaban  
 Nevada Bar No. 9370  
 10726 Del Rudini Street  
 17 Las Vegas, NV 89141

18 Attorney for Plaintiff

Dated this 25<sup>th</sup> day of April, 2024.

14 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
 15  
 16 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
 17 P.C.

18 /s/ Anthony L. Martin

19 Anthony L. Martin  
 Nevada Bar No. 8177  
 Elody C. Tignor  
 Nevada Bar No. 15663  
 10801 W. Charleston Blvd.  
 Suite 500  
 20 Las Vegas, NV 89135

21 Attorneys for Defendant

## 22 ORDER

23 IT IS SO ORDERED.

24   
 UNITED STATES MAGISTRATE JUDGE

25 DATED: April 26, 2024